UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

GRAND JUROR DOE,)
Plaintiff,)
v.) Case No. 4:15-cv-00006
ROBERT P. MCCULLOCH, in his official capacity as Prosecuting Attorney for St. Louis County, Missouri,)))
Defendant.)

MOTION FOR EXTENSION OF TIME

Comes now Defendant, by and through counsel, and states as follows in support of his motion for extension of time in which to file a responsive pleading.

- 1. Defendant's responsive pleading is due January 26, 2015 (Doc. No. 13).
- 2. Undersigned counsel has been responsible for other litigation, particularly stay-of-execution litigation, and two first-degree murder trials.
- 3. Defendant's counsel contacted Plaintiff's counsel, Grant Doty, who stated Plaintiff had no objection and consents to Defendant's request for a fourteen-day extension of time to file a responsive pleading.
- 4. This request is not designed to vex or harass Plaintiff; Plaintiff's substantive rights should not be adversely affected.

WHEREFORE Defendant prays the court grant him a fourteen-day extension, until February 9, 2015, to file a responsive pleading.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2015, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF electronic notification system which sent notification of such filing to the following:

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